

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HARPERCOLLINS PUBLISHERS LLC,

Plaintiff,

v.

OPEN ROAD INTEGRATED MEDIA, LLP,

Defendant.

Case No. 1:11-cv-09499-NRB

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that upon the annexed Memorandum of Law in Support of Plaintiff HarperCollins Publishers LLC's Motion For Summary Judgment and accompanying Local Rule 56.1 Statement Of Material Facts As To Which There Is No Genuine Issue To Be Tried, and the Declarations of Dr. Andries van Dam, Kate Jackson and R. Bruce Rich (and the exhibits thereto), Plaintiff HarperCollins Publishers LLC hereby moves the Court, before the Honorable Naomi Reice Buchwald, United States District Judge, United States District Court for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York for an order pursuant to Rule 56(a) of the Federal Rules of Civil Procedure for summary judgment as to the cause of action of Plaintiff's complaint, and for such other and further relief as this Court may deem just and proper.

Dated: March 18, 2013

WEIL, GOTSHAL & MANGES LLP

By: /s/ R. Bruce Rich

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